

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MEGAN GREEN,	)	
	)	
Plaintiff,	)	Case No. 4:18-CV-01629-JCH
	)	
v.	)	JURY TRIAL DEMANDED
	)	
CITY OF ST. LOUIS, et al.	)	
	)	
Defendants.	)	

MOTION TO DISMISS OF INDIVIDUAL DEFENDANTS

Pursuant to F.R.Civ.P. 12(b)(6), individual defendants Cliff Sommer, Bennie Blackmon, Daniel Cora, Joseph Calabro, Lt. Col. Lawrence O'Toole, Charlene Deeken, Nicholas Manasco, Lance Coats, Joshua Becherer, Matt Tesreau, Michael Flatley, Joseph Busso, Jon Long, and Timothy Boyce move to dismiss plaintiff's second amended complaint for failure to state a claim on which relief can be granted, and because said defendants (other than Lt. Col. O'Toole and Ms. Deeken) are entitled to qualified immunity herein.

Individual defendants file a memorandum in support concurrently herewith.

WHEREFORE, the named individual defendants move the Court to dismiss all federal claims herein with prejudice, and all state claims without prejudice, at plaintiff's cost, including reasonable attorney's fees.

Respectfully submitted,

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